

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

MANUEL ROMAN, JIQUELLE
KINNARD, and ANTHONY
HAYWARD, individually and on behalf
of all persons similarly situated

Plaintiffs,

v.

PRINCE TELECOM, LLC, COMCAST
CORPORATION, and COMCAST
CABLE COMMUNICATIONS
MANAGEMENT LLC,

Defendant.

Civil Action No. 1:21-cv-00693-CCC

**DEFENDANTS COMCAST CORPORATION AND COMCAST CABLE
COMMUNICATIONS MANAGEMENT, LLC'S MOTION TO DISMISS
THE CLAIMS OF NAMED PLAINTIFFS MANUEL ROMAN AND
ANTHONY HAYWARD AND OPT IN PLAINTIFFS MICHAEL
FAUNTLEROY, KEVIN MURPHY, AARON MCMULLEN, HAMILTON
NEGRON, PEDRO ORTEGA, OSHANE MORRIS AND VLADIMIR
PIERRE OR, ALTERNATIVELY, TO STAY THEIR CLAIMS
AND COMPEL ARBITRATION**

Pursuant to the Federal Arbitration Act, 9 U.S.C. §§ 1, *et seq.*, and Federal Rule of Civil Procedure 12(b), Defendants Comcast Corporation and Comcast Cable Communications Management, LLC respectfully submit this motion to dismiss the claims of Named Plaintiffs Manuel Roman and Anthony Hayward and Opt-In Plaintiffs Michael Fauntleroy, Aaron McMullen, Oshane Morris, Kevin Murphy, Hamilton Negron, Pedro Ortega, and Vladimir Pierre (collectively

“Arbitration Plaintiffs”) or, alternatively, to stay their claims in this case and compel them to individual arbitration.

Dated: May 27, 2021

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Michael J. Puma

Michael J. Puma (admitted *pro hac vice*)

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Attorneys for Defendants Comcast Corporation and Comcast Cable Communications Management, LLC

CERTIFICATE OF NONCONCURRENCE

Per Local Rule 7.1, counsel for Defendants Comcast Corporation and Comcast Cable Communications Management, LLC certifies that they sought concurrence in this Motion from each party. Plaintiffs have not given their concurrence. Defendant Prince Telecom, LLC has given its concurrence.

/s/ Michael J. Puma
Michael J. Puma

CERTIFICATE OF SERVICE

I hereby certify that on this date the foregoing document was filed on the ECF system and therefore served on all counsel of record.

Dated: May 27, 2021

/s/ Michael J. Puma